

FILED - GR

September 3, 2008 11:46 AM

RONALD C. WESTON, SR., CLERK
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY: ald /

U.S. District Court
399 Federal Bldg.
Grand Rapids, Mi. 49503

1:08-cv-836

Paul L Maloney - Chief U.S. District Judge
Joseph G Scoville - U.S. Magistrate Judge

Robert Langford
Plaintiff,

v

Sheriff Lawrence Stelma, County Commissioners,
Jail administration, Medical Supervisor Hsu, War
and Dr. Jacob, the Lt., Capt. Co. Defendants
Defendants

Civil Litigation Suite

I am coming to the Courts seeking relief from Violation
of rights and mistreatment by jail administration, Medical and Deputies: On Jan 5,
2008 I was arrested and lodged in the County jail, Upon entering the County jail I was
interviewed by medical staff about medical issues, I only told them about the
psychotic medication I was taken when I was with Michigan Department of Correction.
In 03 until I made out on 12-27-07, Dr. Jacob went on the internet and seen where
I used to take Zocor for high Cholesterol and ordered the medication without my
consent, I was given this medication, because I asked the Nurse that passed
out Medication what was I been given, I was told psychiatric meds. When I really
found out what it was Medical staff had flagged my account for \$15.00 from
1-8-08 until 3-13-08, How can a Dr. Write me a prescription without asking
me if I wanted the medication?.. Two I was put in Max security where
the heat and the window were broken out, the jail administration refused
to move the four people in the block, the County Commissioners was contacted and
the jail administration was very upset, I file a Complaint with the Commissioners.

on 3-18-08 before that we were given as many as five blankets to keep warm, we were told by first shift, Classification, Sgt. and second shift Sgt. that they were not going to move us, they were prejudice because we were all black inmates, in the process I have had serious pain in my left shoulder & real serious pain in my right shoulder to where I can't even sleep at night, I was given some tylenol, anti-flammatory medication, it didn't work, so I've been requesting to see the Dr. again since 5-1-08, 5-19-08, 6-4-08, 7-5-08, 7-8-08, 7-10-08 and on 6-22-08 I sent letter to Capt. Singleton about my arm & shoulder, Medical has still refused to see me, because they want me to pay them two dollars, & eight dollars to see the Dr. I've seen them the first time I seen the Dr. there is no need for me to see them again for \$2.00, they have also stolen \$29.93 from my account I owe them \$0.00 for seeing the Nurse and Dr. about my arm.

Third I have lost a lot of weight since I've been here, I came in weighing 176 lb. and now I weight 145, and still losing weight, the Dietician claims he feeds us 2500 Calories a day that's the reason why the inmates are losing weight, I cooked in the Army and 2500 Calories for all three meals there's something wrong with that, the body requires a certain amount of sugar a day, all we get is pears, peaches, oranges and apple this is every day, No real dessert like cake, when we get served hot cereal or cold cereal there's No butter nor sugar basically one or the other for breakfast. So I come to the Honorable Courts seeking medical benefits for treatment for my shoulders which was caused by Negligence of Sheriff Lawrence Stelma, The County Commissioners and the Jail Administration, Medical Staff with Prejudice that manifested injustice that resulted in me suffering ridiculous Pain and not being able to sleep, I've exhausted all administrative, I was denied a Grievance form, if they run services for Chronic Care than I should have not been charged for the Zocor. I am seeking 3.12 Million dollars for damages

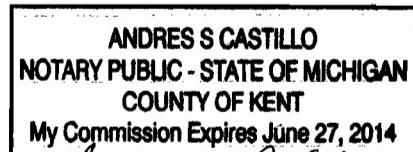
and \$96,0000.000 in punitive damages, I pray the honorable Court will grant me relief of damages and seek to be lodge in a Near by County Jail because of being denied Medical treatments. Medical Staff has taken money from my account without explaining why the money is taken, they are Violating there own policy, because we are in supper MoF and can see the policy they put up in one man and four man, until we go out for hair Cut. Medical has caused me stress, depression, sleepless night and Considerable weight lost, and seek permant assistance with medical treatment of my Shoulder.

I do hereby certify that the information contained
in this Affidavit is true to the best of my knowledge

Robert Sosa 7-1-08

Subscribed and Sworn to before
me this

Original Affidavit



Andres S. Castillo

U.S. District Court
399 Federal Bldg.
Grand Rapids, MI. 49503

Amended
Information on
Civil Segregation Suit

Add on to The Defendants
Sgt. Burnheart, Sgt. Leming
The Head Nurse and Nursing Staff
Co-Defendants

The Kent County has a Grievance procedure, but will not allow inmates to realize the procedure. There are serious problem that lies with in the Administration and Deputy, Administrative Segregation Unit is Not punitive, but can't receive regular visit. Nor can we used the phone between 8:00 AM to 5: pm to contact or to talk to your attorney, we are being denied access to our attorney. I was placed Disciplinary Segregation Unit for a total of 25 days, I haven't had any write ups since being here, but when time for me to leave I was not allowed to leave. Sgt. Burnheart is in Charge of Classification and is very biased toward me. Since I have been incarcerated I have lost a considerable amount of weight on a three meal 2,500 Calories, but in Disciplinary Segregation you are fed breakfast Unsweetening Cereal (No sugar) Four slices of bread with butter, Orange juice, lunch four slice of bread, two butter, one cold piece of bologna, orange and milk, dinner two Burger King patties, four slice of bread, one baked potato Cold and Collard green or green beans out of can or frozen bag just barely heated. Also accounting office has skimmed \$54. 93 from my Veterans Check and didn't response as to why this is being taken, I've asked for a Grievance, but was told Medical is Not an issue you can griever. I am also seeking an injunction to remove me from DIA after I do my disciplinary time which is up 9-3-08, The staff here has caused me serious pain in my shoulder I can't even sleep at all, the Dr. writes medication for me, but for only two

{page 2 of 4}

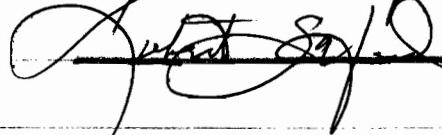
Weeks, that's so when I Kite them about the Meds. they can charge me \$2.00 for the Nurse, \$8.00 for the Dr. and five dollars for Medication and they know by me being in DIA they keep cold air blowing in the Vents at all times, My shoulder hurts like hell, back in Jan. of 08 I was in a four man Cell where the window was broken out and the heat did not work, we the other three inmates asked repeatedly to be moved, but was denied, so finally 3rd shift Sgt. told the Deputy to issue us extra blankets, one inmates mother contacted the County Commissioner, but didn't change anything, so finally in April with only two of us left in the Cell they finally move us, but not before I substan damages to my shoulder when it warm it hurts, but not as bad compare to where its really cold at, you are not supposed to, but I have to plug my Vents up, because if I don't I would be in tears, Also my water in my Cell has been cut off since 8-24-08 because I threw a milk carton of water on a trustee for telling me he was going to spit in my food. These are the dates and Shift my was supposed to be turn on for 1 hrs. and Not, Water turn off 8-24-08 at 8:pm, on 8-25-08 3rd shift turn water on at 4 Am for 1 hrs, 1st shift on 8-25-08 did not turn water on at all, 2nd shift turned water on for $\frac{1}{2}$ hrs, 3rd shift turn water on for 1 hrs, 8-26-08 1st shift would not turn water on at all, then finally around 10 AM water on for $\frac{1}{2}$ hrs, 3rd shift turned water on for 1 hrs. then at 4: Am for 1 hrs, 8-27-08 water for 1st shift never turned on water all day, 2nd shift turned water on around 7pm, 3rd shift never turned water on at all, 1st shift no water at all, 2nd shift turned water on twice, but for 10 minutes each and this was for 8-28-08, 8-29-08 1st shift no water at all, 2nd shift turn water on once for 10 minutes that's all, 3rd shift no water at all, 1st Shift 8-30-08 No water, Now my water has been off for 8 day, because of a cup of water.

I threw on a trusty for threatening to spit in my food, Now for flooding they turn your water off, but for throwing a milk carton of water and my water has been off for 8 days Deputy are suppose to log in on a sheet when they turn my water on, but at least I ask it only cause a problem, again a write up only keeps me here longer, so I stopped asking and start keeping records myself Sheriff Lawrence Stelma, the Under sheriff and the administration has no clue as to how African-American and Hispanics are being treated by staff, There are staff here that knows about Deputies behavior has seen and witnessed it, but because of their job will not go forward to the Jail Administration, but in the mean time the inmate suffers I also seek and pray for an Court Order to get the Jail Administration to serve the same food as the rest of the population in Disciplinary Segregation Unit also D.S.U, the two bags breakfast, and lunch, Breakfast Unsweet Cereal, four slice of bread four butter, one orange juice and milk, for lunch one orange, four slices of bread, 4 butter, one cold piece of bologna, for dinner two burger King patties four slices of bread, two butter, one baked potato half done, Can Collard green or green beans heated up and put on tray, Milk. This is extreme cruel and unusually punishment. I am also seeking

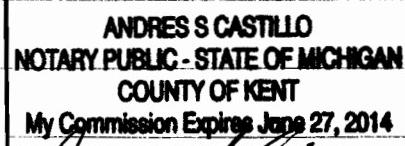
{page 4 of 4}

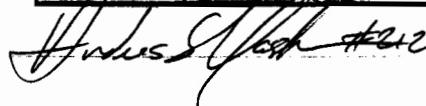
Now for flooding they are suppose to turn your water off but didn't, and now for throwing one Carton Water, they are keeping my water off for ever. This Sheriff Lawrence Stelma, the Undersheriff and the Administration has No Clue as to how inmates are being treated by deputies, there are staff here that Works With Medical I don't want to give names right now, for fear of retaliation and that's what they are affair off, but if this goes to Court, I will be forced to call them as witness. Also I see a Court order to have Jail Administration to provide the same food trays to Disciplinary Segregation Unit also DSU we received bag breakfest, lunch as I mention in my Complaint, which is Curel and extreme unusual punishment. I am also seeking 2.18 million from Medical Staff, and Dr. Jacob I am seek in damages \$500,000.000.000 = will also include punitive damages. I pray that the Honorable Court will grant my two injection and allow me to proceed in Court with my Civil litigation Suit.

I do hereby Certify that the information
~~contain in this Affidavit is true to the best of my knowledge~~



9-1-08




James J. Cook #212